



different position involving purchasing merchant products and writing reviews to boost their e-commerce scores. *Id.* Lena convinced Plaintiff to proceed by promising a salary of up to \$8,000 per month.

At Lena's direction, Plaintiff created an account on the albertAI.click platform and was "trained" for her new position by Lena. Plaintiff was then informed that she had been given a "lucky order" which promised up to ten times her commission. Lena explained that Plaintiff needed to "top up" her reserve account in order to be eligible for this "lucky order." Plaintiff then deposited \$35 of her own money after being told that it was temporary and she would be able to withdraw her deposit plus commission later on.

Over the next several months, Plaintiff continued to work for the fraudulent entity posing as Albert AI. Plaintiff was allowed to make occasional withdrawals over time, which provided an illusion of legitimacy to the company.

During this period, Plaintiff was informed that she won a "Lucky 7 Anniversary Celebration" bonus, which represented a commission of almost \$800,000. In late February 2025, Plaintiff attempted to withdraw these earnings but was unable. Defendants representing themselves as the "Albert AI Finance Department" then informed Plaintiff that in order to access her funds she needed to pay (1) insurance fees in the amount of \$71,000, (2) large transaction verification deposits in the amount of \$200,000, and (3) exchange fees in the amount of \$101,000.

After paying these “fees,” Plaintiff was still unable to access her funds. Sensing she had been scammed, Plaintiff contacted the real Albert AI, who then confirmed her suspicions by informing her that albertAI.click was not associated with Albert AI. In total, Plaintiff alleges that she lost \$372,000 to the scammers.

After retaining counsel, Plaintiff’s blockchain investigator performed a “blockchain tracing” report. This “tracing” refers to the process of following digital assets from location to location on the blockchain via publicly available data. Ex. 1, Cole Declaration, ¶ 5. Plaintiff’s investigator was able to trace her allegedly stolen assets to cryptocurrency-exchange accounts that ultimately received the assets she alleges were stolen from her (together the “Target Accounts”). The Target Accounts are as follows:

Recipient in Transactions	Associated Entity	Amount Traced (in USD)
0xb4f1c7058ea35690087114f5058ab5b381ce190f8dc072ff6504e722beceec7e  0x6d1305207103561117cb450ef12362e104722ba8186bfd8f4382277713705c0a	Bitget	\$100,800.00
0x37e64011b6b6fd8c01db2ee13ce9450562ab4eaf7cee75589ba47712efa4a77c  0x6cb1f65d97af4d548f839a0343ed7863d2d09963f81f646f1da52c2697bbc468	Binance	\$170,000.00

0x3c44e4de6499cb3bbaea23b c9f8f8e821eba2a3e470fb0132 5fd1b7e9873e0e1		
0xf14b3592ed927893f3f4e76a 8f2218c6b9dc9369521ca2058 845c4ccba0d37fa		
0x47af66805c960997a3beb50 e4285d782546cfdeb6737f015 47e4f0238b29886e		

In the instant Motion, Plaintiff asks the Court to order that these cryptocurrency-exchange accounts be frozen through trial, so that she might preserve some assets for recovery.

## II. Analysis

Plaintiff has met the requirements for issuance of a Preliminary Injunction for the following reasons. First, Plaintiff has shown that the Defendants had notice of her Motion and this hearing as required under Federal Rule of Civil Procedure 65(a)(1). The Hoda Declaration describes the methods used to provide notice to the Defendants here. Ex. 2, Hoda Declaration, ¶ 3.

Next, Plaintiff has met the substantive requisites for issuance of a preliminary injunction. To obtain a preliminary injunction, the movant must show (1) a substantial likelihood of success on the merits, (2) a substantial threat of irreparable harm if the injunction does not issue, (3) that the threatened injury outweighs any harm that will result if the injunction is granted, and (4) that the grant of an injunction is in the public interest. *Moore*

*v. Brown*, 868 F.3d 398, 402-03 (5th Cir. 2017). Each of these requisites is addressed in turn below.

Plaintiff makes claims against the Defendants for violation of the Racketeering Influenced and Corrupt Organizations Act (“RICO”), fraud, and conversion. She has alleged and provided evidence that the Defendants deceived her and misappropriated her assets in what appears to have been an intentional scam. Compl., ¶¶ 13 – 18; Cole Decl., ¶¶ 3 – 6. The Court finds, at this stage, that the similarities between Plaintiff’s allegations and the widely known characteristics of this distinctive kind of scam suggest that she will indeed be able to prevail on these claims once a full evidentiary record is developed.

In addition, as in the previous order granting the extant TRO, the Court notes that asset freeze Plaintiff seeks in this instance is permissible in light of her request for a constructive trust over specific, traceable stolen assets, as several courts have held in analogous cryptocurrency-fraud cases. *See, e.g., Yogaratnam v. Dubois*, No. CV 24-393, 2024 WL 758387, at \*3 (E.D. La. Feb. 23, 2024) (issuing asset-freeze TRO in crypto-fraud case, noting that “numerous district courts ... have issued a TRO in this exact circumstance to freeze a cryptocurrency asset,” and collecting cases); *Jacobo*, 2022 WL 2052637, at \*3 (issuing asset-freezing TRO where plaintiff sought constructive trust over allegedly stolen assets); *Gaponyuk*, 2023 WL 4670043, at \*2 (same). Plaintiff’s claim that her assets can be traced to their present

locations is supported by the blockchain analysis submitted in support of her Motion. Cole Decl., ¶ 5.

Plaintiff has also shown that irreparable harm will ensue absent the restraining order she seeks. The assets at issue could be further transferred to unretrievable locations at any time, with the click of a button. Cole Decl., ¶ 6. Several federal courts have found that this exigency justified issuance of freezing orders in similar crypto-fraud cases, and this Court finds their reasoning persuasive here.<sup>1</sup>

Next, the Court finds that the threatened injury to Plaintiff outweighs any harm the Defendants may suffer by virtue of a freeze of their accounts. The Defendants will suffer at worst a temporary inability to move assets if the injunction is later dissolved. *See, e.g., Licht v. Ling*, No. 3:23-CV-1018, 2023 WL 4504585, at \*3 (N.D. Tex. June 20, 2023) (balancing factor weighed in plaintiff's favor because alleged crypto-thieves faced only "inconvenience" of asset-freeze, which could be undone); *Jacobo*, 2022 WL 2052637, at \*6

---

<sup>1</sup> *See, e.g., Ohlin v. Defendant 1*, No. 3:23-C-8856-TKW-HTC, 2023 WL 3676797, at \*3 (N.D. Fla. May 26, 2023) ("Considering the speed with which cryptocurrency transactions are made as well as the anonymous nature of those transactions, it is imperative to freeze the Destination Addresses to maintain the status quo to avoid dissipation of the money illegally taken from Plaintiffs."); *Jacobo v. Doe*, No. 1:22-CV-00672DADBAKBAM, 2022 WL 2052637, at \*3 (E.D. Cal. June 7, 2022) ("Because it would be a simple matter for [defendant] to transfer [the] cryptocurrency to unidentified recipients outside the traditional banking system and effectively place the assets at issue in this matter beyond the reach of the court, the court finds that plaintiff is likely to suffer immediate and irreparable harm in the absence of injunctive relief.") (cleaned up); *Astrove v. Doe*, No. 1:22-CV-80614-RAR, 2022 WL 2805315, at \*3 (S.D. Fla. Apr. 22, 2022) (same).

(same, finding “[a] delay in defendant’s ability to transfer the [allegedly stolen] assets only minimally prejudices defendant, whereas withholding injunctive relief would severely prejudice plaintiff by providing defendant time to transfer the allegedly purloined assets into other accounts beyond the reach of this court”). In contrast, maintaining the assets at the destination accounts is perhaps Plaintiff’s only realistic chance at recovery in this case.

Finally, the Court finds that issuing the injunction is in the public interest. In fact, in this case, the public interest weighs particularly heavily in favor of the requested injunction. As other courts have noted, issuing the relief requested will “provide[] assurance to the public that courts will take action to promote ... recovery of stolen assets when they can be readily located and traced to specific locations.” *Jacobo*, 2022 WL 2052637, at \*6.

### III. Preliminary Injunction

Plaintiff has submitted evidence tracing the assets she alleges were stolen from her the Target Accounts, which are the accounts identified by the following markers:

Recipient in Transactions	Associated Entity	Amount Traced (in USD)
0xb4f1c7058ea35690087114f5058ab5b381ce190f8dc072ff6504e722beceec7e  0x6d1305207103561117cb450ef12362e104722ba8186bfd8f4382277713705c0a	Bitget	\$100,800.00

0x37e64011b6b6fd8c01db2ee 13ce9450562ab4eaf7cee7558 9ba47712efa4a77c  0x6cb1f65d97af4d548f839a03 43ed7863d2d09963f81f646f1 da52c2697bbc468  0x3c44e4de6499cb3bbaea23b c9f8f8e821eba2a3e470fb0132 5fd1b7e9873e0e1  0xf14b3592ed927893f3f4e76a 8f2218c6b9dc9369521ca2058 845c4ccba0d37fa  0x47af66805c960997a3beb50 e4285d782546cfdeb6737f015 47e4f0238b29886e	Binance	\$170,000.00
--	---------	--------------

For the reasons set out in the Motion, the Court finds that the Target Accounts should be frozen. Accordingly, the Court hereby **ORDERS** that Defendants and their agents, servants, employees, attorneys, partners, successors, assigns, and all other persons or entities through which they act or who act in active concert or participation with any of them, who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any trust, corporation, subsidiary, division or other device, or any of them, are hereby restrained from withdrawing, transferring, or encumbering any assets currently held by, for, or on behalf of the persons controlling the accounts associated with the above-listed Target Accounts, or any business entity through which they act or which acts in active concert or participation with them; including but not limited to those assets currently held at or for the Target Accounts.

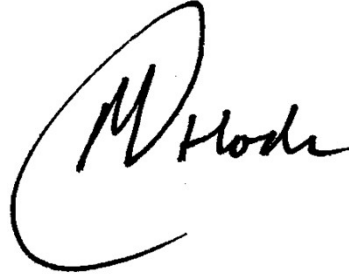
The Court **ORDERS** that Plaintiff shall cause a copy of this Order to be served on the above-listed entities in a manner compliant with Rule 4 or as the Court may further direct. Upon receiving a copy of this Order, these entities shall be restrained and enjoined from disturbing assets, directly or indirectly, to or on behalf of Defendants or any entities under Defendants' control. Additionally, the Court **ORDERS** that all movement, alteration, or destruction of books, records, and accounts related to the above-listed blockchain addresses is prohibited. The Court declines to impose a bond.

The preliminary injunction set out in this Order shall continue until trial or further order of the Court.

Dated: July 7, 2025

Prepared By:

THE HODA LAW FIRM, PLLC

A handwritten signature in black ink, appearing to read "M Hoda", enclosed within a large, loopy circular flourish.

---

Marshal J. Hoda, Esq.  
Tx. Bar No. 2411009  
Alexander Crous, Esq.  
Tx. Bar No. 24136488  
3120 Southwest Fwy  
Ste 101, PMB 51811  
Houston, TX 77080  
marshal@thehodalawfirm.com  
alex@thehodalawfirm.com  
o. (832) 848-0036

*Attorneys for Plaintiff*